

**BUCHANAN INGERSOLL & ROONEY PC**

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*Attorneys for Defendants Trans Union LLC, Neustar, Inc.,*

*and TransUnion Risk and Alternative Data*

*Solutions, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,  
*as assignee of individuals who are Covered  
Persons, et al.,*

Plaintiffs,

v.

TRANSUNION, LLC, NEUSTAR, INC.,  
TRANSUNION RISK AND  
ALTERNATIVE DATA SOLUTIONS, INC.,  
RICHARD ROES 1-10, *fictitious names of  
unknown individuals* and ABC COMPANIES  
1-10, *fictitious names of unknown entities,*

Defendants.

Case No.: 2:24-cv-04288-EP-MAH

**APPLICATION FOR AUTOMATIC  
CLERK'S EXTENSION PURSUANT  
TO LOCAL CIVIL RULE 6.1(b)**

Defendant Trans Union LLC, ("TransUnion"), Neustar, Inc. ("Neustar"), and TransUnion Risk and Alternative Data Solutions, Inc. ("TRADS") (collectively, the "Defendants"), by and through their undersigned counsel, hereby request entry of a Clerk's Order extending their time to answer, move, or otherwise Respond to Plaintiffs' Complaint, and in support says as follows:

1. Defendants have not previously requested an extension of time.
2. On February 8, 2024, Atlas Data Privacy Corporation ("Atlas") and the Individual

Plaintiffs (collectively, “Plaintiffs”) commenced this action against Defendants in the Superior Court of New Jersey, Law Division, Bergen County entitled *Atlas Data Privacy Corporation, et al., v. Trans Union, LLC, et al.*, Docket No. BER-L-000810-24 (the “Action”).

3. On February 16, 2024, Plaintiffs filed an Amended Complaint, naming TRADS as an additional defendant.
4. Defendants TransUnion and Neustar were served on February 26, 2024 and timely moved to remove the Action to the above entitled court on March 27, 2024.
5. Defendant TRADS was served on March 8, 2024 and timely moved to remove the Action to the above entitled court on March 27, 2024.
6. Defendants’ current deadline to answer, move, or otherwise respond to the Complaint is April 3, 2024.
7. Pursuant to Local Civil Rule 6.1(b), Defendants hereby apply for an automatic fourteen (14) day extension of time within which to answer, move, or otherwise respond to the Complaint, through and including April 17, 2024.

Date: April 2, 2024

Respectfully submitted,

**BUCHANAN INGERSOLL & ROONEY PC**

By: /s/ Jacqueline M. Weyand

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